

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

STINGRAY IP SOLUTIONS, LLC,

Plaintiff,

V.

SOMFY SA and SOMFY ACTIVITÉS SA,

Defendants.

§ § § § § § § § § §

JURY TRIAL DEMANDED

CIVIL ACTION NO. 2:21-cv-201-JRG
(Lead Case: 2:21-cv-195-JRG)

CIVIL ACTION NO. 2:21-cv-202-JRG
(Lead Case: 2:21-cv-196-JRG)

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff Stingray IP Solutions, LLC and Defendants Somfy SA and Somfy Activités SA (collectively, the “Parties”) respectfully submit this Joint Motion to Stay All Deadlines and Notice of Settlement. The Parties respectfully inform the Court as follows:

The Parties have reached a settlement in principle of all matters in controversy, pending documentation, and request that the Court stay all deadlines in the above-captioned cases as related to the Parties for thirty (30) days.

Dated: October 29, 2021

/s/Melissa R. Smith

Melissa R. Smith
Texas Bar No. 24001351
GILLAM SMITH LLP
303 South Washing Avenue
Marshall, Texas 75670
Tel: 903.934.8450
Fax: 903.934.9257
melissa@gillamsmithlaw.com

Michael R. Casey
Admitted Pro Hac Vice
Tia D. Fenton
Admitted Pro Hac Vice
OBLON, McCLELLAND, MAIER &
NEUSTADT, LLP
1940 Duke Street
Alexandria, Virginia 22314
Tel: 703.413.3000
Fax: 703.413.2220
mcasey@oblon.com
tfenton@oblon.com

Attorneys for Defendants
Somfy S.A. and Somfy Activités S.A.

Respectfully submitted,

/s/Jeffrey R. Bragalone

Jeffrey R. Bragalone (lead attorney)
Texas Bar No. 02855775
Terry A. Saad
Texas Bar No. 24066015
Marcus Benavides
Texas Bar No. 24035574
Hunter S. Palmer
Texas Bar No. 24080748
BRAGALONE OLEJKO SAAD PC
2200 Ross Avenue
Suite 4600W
Dallas, TX 75201
Tel: (214) 785-6670
Fax: (214) 785-6680
jbragalone@bosfirm.com
tsaad@bosfirm.com
mbenavides@bosfirm.com
hpalmer@bosfirm.com

Wesley Hill
Texas Bar No. 24032294
WARD, SMITH, & HILL, PLLC
P.O. Box 1231
Longview, TX 75606
Tel: (903) 757-6400
Fax: (903) 757-2323
wh@wsfirm.com

ATTORNEYS FOR PLAINTIFF
STINGRAY IP SOLUTIONS, LLC

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(h), I certify that counsel for Plaintiff conferred with counsel for Defendants on October 29, 2021, via e-mail and, as reflected in the body of the Motion, the Parties agree to the form and substance of the Motion, the Motion is unopposed, and the parties jointly submit it to the Court.

/s/ Jeffrey R. Bragalone
Jeffrey R. Bragalone

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on October 29, 2021

/s/ Jeffrey R. Bragalone
Jeffrey R. Bragalone